

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

May 09, 2025

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM SCOTT MORSE,

Defendant.

Case No. 2:25-CR-0054-TOR

STIPULATED PROTECTIVE  
ORDER REGARDING COMPUTER  
FORENSIC REVIEW PROCEDURES  
FOR CHILD PORNOGRAPHY  
CONTRABAND

The Court has received and reviewed the Stipulation Regarding Computer Forensic Review Procedures for Child Pornography Contraband filed by the parties in the above-captioned matter and is fully advised.

GOOD CAUSE HAVING BEEN SHOWN, the Court hereby ORDERS that the Stipulation Regarding Computer Forensic Review Procedures for Child Pornography Contraband filed by the parties is GRANTED.

1. IT IS FURTHER ORDERED that 18 U.S.C. § 3509(m) applies to this case, and the Court is required to deny defense requests to copy, photograph, duplicate, or

1 otherwise reproduce material constituting child pornography if the government makes  
2 the material reasonably available to Defendant and provides an ample opportunity for  
3 the defense to examine it at a government facility. *See* 18 U.S.C. § 3509(m).  
4

5 2. IT IS FURTHER ORDERED that, in order to comply with 18 U.S.C.  
6 § 3509(m), and to allow Defendant the greatest opportunity to prepare an effective  
7 defense in preparation for trial in this matter, the government will make a true forensic,  
8 bit-by-bit E01 image of devices and media containing alleged child pornography  
9 contraband at issue in the above-referenced case. The government will make that  
10 forensic image reasonably available to Defendant and provide ample opportunity for the  
11 defense team to examine it at a government facility in Spokane, Washington. The parties  
12 may readdress the Court if there is a need for additional or after-hours access during the  
13 course of litigation in the event trial or motion hearings require additional forensic  
14 review.  
15

16 3. IT IS FURTHER ORDERED that the defense forensic examination will be  
17 conducted in an interview room monitored by closed-circuit television (“CC-TV”),  
18 without audio feed. While the TV with non-audio feed will ensure the integrity of FBI  
19 space and security of its occupants, the video feed is not of sufficient detail or at an  
20 angle that would reveal defense strategy. The government and its agents expressly agree  
21 that no attempt will be made to record any audio from the workstation and that no  
22 attempt will be made to observe the defense team’s work product or computer monitor  
23 screen at any time. The defense expert may review the feed to ensure that defense  
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28

1 strategy is not being compromised at any time while conducting the forensic review.

2 4. IT IS FURTHER ORDERED that the defense team<sup>1</sup> shall not make,  
3  
4 nor permit to be made, any copies of the alleged child pornography contraband  
5 pursuant to this Protective Order and shall not remove any contraband images from  
6 the government facility. The defense expert will be allowed to copy any file that is  
7  
8 not contraband and compile a report (without contraband images/videos) documenting  
9 the examination on removable media at the discretion of the defense expert.

10 5. IT IS FURTHER ORDERED that the designated defense expert,  
11 Jennifer McCann, will leave at the government facility any equipment, including  
12  
13 hard drives, which contain child pornography contraband that is identified during  
14 forensic evaluation. The parties may readdress this matter with the Court upon notice  
15 that the defense intends to retain a different defense expert.

16  
17 6. IT IS FURTHER ORDERED that for the purpose of trial, the government  
18 agrees to make available a digital copy of any government trial exhibit that contains  
19  
20 contraband, which will be kept in the custody and control of the case agent. Upon  
21 reasonable notice by the defense, the case agent will also maintain for trial digital copies  
22 of any proposed defense exhibit that contains contraband. If the defense team intends to  
23  
24 offer, publish, or otherwise utilize any government or defense exhibit contained on the  
25 digital copy maintained by the case agent during trial, the case agent shall assist the  
26 defense team in publishing or utilizing the exhibit that contains contraband upon  
27  
28 notification by the defense team.

1 IT IS SO ORDERED. The Clerk shall enter this Order and furnish copies to  
2 counsel.

3  
4 Dated May 9, 2025.

A handwritten signature in blue ink that reads "Thomas O. Rice".

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THOMAS O. RICE  
UNITED STATES DISTRICT JUDGE